

RUSS, AUGUST & KABAT

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

RED HAT, INC.,

Plaintiff,

v.

VIRTAMOVE CORP.,

Defendant.

Case No. 5:24-cv-04740-PCP

**[PROPOSED] ORDER GRANTING  
PLAINTIFF RED HAT'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER DEFENDANT'S  
MATERIALS SHOULD BE SEALED**

Jury Trial Demanded

Judge Hon. P. Casey Pitts  
Location: Courtroom 8, 4th Floor

1 Now before the Court is Plaintiff Red Hat's Administrative Motion to Consider Whether  
2 Defendant's Materials Should Be Sealed. Having considered the briefing, exhibits, and other  
3 papers filed in support of the motion, and good cause having been found, the Court hereby  
4 GRANTS the motion and orders the following material SEALED:

- 5 • The highlighted portions of Red Hat's Reply in Support of its Contingent Motion  
6 to Conduct Jurisdictional Discovery that refer to information that VirtaMove has a  
7 contractual obligation to not disclose publicly;
- 8 • The entirety of Exhibit 1 to Red Hat's Reply, which references this same  
9 information; and
- 10 • The entirety of Exhibit 2 to Red Hat's Reply, which also references this same  
11 information.

12  
13 **IT IS SO ORDERED.**

14  
15 Dated: \_\_\_\_\_, 2024

16  
17 \_\_\_\_\_  
18 Hon. P. Casey Pitts  
19 United States District Judge  
20  
21  
22  
23  
24  
25  
26  
27  
28